



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

NOV 18 2004

Mr. Michael D. Sorel, P.E.  
Site Manager / BRAC Environmental Coordinator  
AFRPA/DA  
304 New York Rd  
Plattsburgh, New York 12903

Re: CERCLA Five-Year Review  
Plattsburgh Air Force Base

Dear Mr. Sorel:

In conjunction with my letter to Ms. Kathryn Halvorson, Acting Director of the Air Force Real Property Agency (AFRPA), regarding the Second Five-Year Review Report for Plattsburgh Air Force Base (AFB), listed below are some of the ongoing activities that we expect to resolve in the future. Additional detail regarding these activities will be provided to your office via electronic mail.

1. The Human Health Risk Evaluations submitted within the report for Sites SS-005 and SS-006 support unlimited use without restriction. However, they were based on old soil sampling plans and testing procedures. Further discussion on the statistical basis of the sampling plans and accuracy of the testing procedures is appropriate.
2. The report suggests reduced sampling at sites LF-021, LF-022, LF-023 and SS-028 / SS-018. While we concur with some of the report's suggestions for reduced sampling, further discussion is needed regarding some of the suggested reductions.
3. The report contains the Land Use Control / Institutional Control (LUC/IC) Layering Strategy. This strategy appears to establish a reasonable approach to ensuring long term effectiveness. It has not been clearly established what level of oversight EPA should have regarding this plan. Further discussions, perhaps including my regional counsel, appear appropriate.
4. Site groundwater contamination has not been found in any drinking water supply. However, at site LF-023, it is noted that sentry wells have had arsenic exceedances. These wells need to be watched closely, and additional sentry wells outside of the area of contamination may be needed. Also, it has been reported that the City of Plattsburgh plans to install a city water line to the residences located just off-base from LF-023. Please keep the region apprised of progress in this regard.

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5. This regional office has been evaluating the potential of vapor intrusion into buildings which are located over contaminated groundwater plumes. It is suggested that some initial screening of this potential exposure pathway be considered.

6. EPA recognizes that this is a large complex site containing a large number of areas of possible contamination. EPA has concurred with the protectiveness determinations made in conjunction with CERCLA. While we do not know of any other health or safety concerns, our concurrence in protectiveness is strictly limited to CERCLA decisions and actions.

If you have any questions regarding the subject of this letter, please contact me at (212) 637-4390 or have your staff contact Bob Morse, EPA Project Manager, at (212) 637-4331.

Sincerely,



f George Pavlou, Director  
Emergency and Remedial Response Division

cc: Kathryn M. Halvorson, AFRPA  
James Waldron, AFRPA  
James Lister, NYSDEC